

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

VINCENT LAWRENCE,

Plaintiff,

v.

Case No.: 1:24-cv-11493-ADB

KALM FINANCIAL, INC., *et al.*,

Defendant.

MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Pursuant to Fed. R. Civ. P. 6, Defendant, Turbo Debt LLC (“Turbo Debt” or “Defendant”) moves to extend the time to answer or otherwise respond to the Amended Complaint in this action to June 28, 2024. Counsel for Defendant has contacted Plaintiff by phone and electronic mail but was not able to confer with Plaintiff concerning his position on this Motion. The reason for the requested extension is that the Defendant requires additional time to prepare a response to the complaint following the recent removal of this action to this Court.

WHEREFORE, Defendant respectfully requests that the court extend the deadline to answer or otherwise response to the Amended Complaint to June 28, 2024.

Dated: June 14, 2024.

Respectfully submitted,

By: /s/ Melanie A. Conroy
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Motion to Extend Time to Respond to Complaint
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Attorneys for Turbo Debt, LLC

LOCAL RULE 7.1(A)(2) CERTIFICATION

I, Melanie A. Conroy, counsel for Defendant, Turbo Debt, LLC, hereby certify that on June 14, 2024, I contacted Plaintiff, who appears in this matter *pro se*, by telephone and electronic mail and requested his assent to this Motion but was not able to confer with Plaintiff concerning his position on this Motion.

CERTIFICATE OF SERVICE

I hereby certify that on this date, June 7, 2024, this document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). A copy will also be sent via electronic mail to Plaintiff at the address vlawrence02121@gmail.com.

By: /s/ Melanie A. Conroy
Melanie A. Conroy (BBO No. 568830)